

EXHIBIT 16

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Attorneys for Defendant ARISTA NETWORKS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CISCO SYSTEMS, INC.,

Plaintiff,

v.

ARISTA NETWORKS, INC.,

Defendant.

Case No. 5:14-cv-05344-BLF (PSG)

DECLARATION OF WILLIAM T. NELSON

Judge: Hon. Beth Labson Freeman

Date Filed: December 5, 2014

Trial Date: November 21, 2016

1 I, William T. Nelson, declare and state as follows:

2 1. I am over the age of eighteen years, and I am not a party to this action. I make this
3 declaration based upon my personal knowledge and, if called as a witness, I could testify
4 competently thereto.

5 2. From October 2000 to February 2005, I was employed by Nortel Networks, first as
6 a Manager of Alteon Sustaining Engineering (October 2000 to June 2002), and then as a Manager
7 of Alteon Customer Projects (June 2002 to February 2005). In February 2005, I became one of
8 the founders of Blade Network Technologies (BNT). From February 2005 to January 2011, I was
9 the VP of Customer Advocacy and Services for BNT.

10 3. In my capacity as a former employee of Nortel Networks and BNT I am familiar
11 with the early development of Nortel Networks Command Line Interface (or NNCLI), which later
12 became BNT's Industry Standard CLI (or ISCLI).

13 4. I do not know exactly when NNCLI was first developed but it was sometime in the
14 late 1990's. By October 2000, Nortel had made a decision to increase its use of and support for
15 NNCLI. Nortel made this decision in response to marketplace demand for a command-line
16 interface language that would be particular to Nortel products, but familiar to users of command-
17 line interface languages developed by Cisco, 3COM, and Extreme Networks.

18 5. In 2005, Blade Network Technologies (BNT) was spun off from Nortel Networks.
19 At that time, BNT renamed NNCLI, calling it "Industry Standard CLI" or "ISCLI". No
20 substantive changes were made to the ISCLI at the time (other than ongoing development) but the
21 name was changed in order to remove the reference to Nortel. BNT was already developing a
22 menu-based CLI called Blade OS CLI so the Blade name was not available. The name "Industry
23 Standard" CLI was chosen because this type of command-line interface language had become
24 accepted within the industry and familiar to engineers likely to be using Blade switches.

25 I declare under penalty of perjury under the laws of the United States that the foregoing is
26 true and correct, and that this declaration was executed on May 26, 2016, in Raleigh, North
27 Carolina.

1 Dated: 27 May 2016

2
3 By:

4 William T. Nelson